

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

John K. Goodrow, :
Plaintiff, :
v. : Civil Action No: 3:11-cv-00020-MHL
Friedman & MacFadyen, P.A. and : (Consolidated)
Johnie R. Muncy, :
Defendants.

JOINT STATUS REPORT CONCERNING MEDIATION PREPARATION

On November 22, 2011 (docket entry 66), the Court entered a stay in these consolidated proceedings to permit the parties to attempt to mediate the pending dispute not just with respect to those claims already the subject of pending lawsuits, but also with respect to similar claims for other clients represented by plaintiffs' counsel. On March 23, 2012 (docket entry 36), the Court extended the stay on the joint motion of the parties. The parties jointly submit this status report pursuant to the Court's November 22, 2011 and March 23, 2012 orders.

1. The initial round of negotiation on these cases took place on May 2, 2012.
2. Plaintiffs' counsel provided Defendants with an outline of settlement terms to be considered, and the parties entered into a tolling agreement to maintain the status quo while negotiations continue.
3. On May 29, 2012, Defendants made a formal written offer now being considered by Plaintiffs and their counsel.
4. The parties may either continue negotiation directly or reconvene before Mag. J. Dennis Dohnal (ret.) in private mediation.

DATED: May 30, 2012

Respectfully Submitted,

**FRIEDMAN & MACFADYEN, P.A.
JOHNIE MUNCY**

By Counsel

/s/

Douglas P. Rucker, Jr. (VSB # 12776)
Andrew Biondi (VSB # 48100)
Cullen D. Seltzer (VSB #35923)
SANDS ANDERSON PC
2300 Bank of America Center
1111 East Main Street (23219)
P. O. Box 1998
Richmond, VA 23218-1998
(804) 648-1636
(804) 783-7291 (facsimile)
Email: drucker@sandsanderson.com
Email: abiondi@sandsanderson.com
Email: cseltzer@sandsanderson.com
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of May, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

Dale W. Pittman, Esq.
The Law Office of Dale W. Pittman, P.C.
112-A W. Tabb Street
Petersburg, Virginia 23803
Telephone: 804-861-6000
Facsimile: 804-861-3368
dale@pittmanlawoffice.com
Counsel for Plaintiff

John C. Petersen, Esq.
Surovell Isaacs Petersen & Levy PLC
4010 University Drive
Suite 200
Fairfax, Virginia 22030
Telephone: 703-251-5400
Facsimile: 703-591-9285
jpetersen@smillaw.com
Counsel for Plaintiff

Kristi Cahoon Kelly, Esq.
Surovell Isaacs Peterson & Levy PLC
4010 University Drive
Suite 200
Fairfax, Virginia 22030
Telephone: 703-277-9774
Facsimile: 703-591-2149
kkelly@smillaw.com
Counsel for Plaintiff

Leonard Anthony Bennett, Esq.
Consumer Litigation Associates, P.C.
12515 Warwick Boulevard
Suite 100
Newport News, Virginia 23606
Telephone: 757-930-3660
Facsimile: 757-930-3662
lenbennett@cox.net
Counsel for Plaintiff

Matthew J. Erausquin, Esq.
Consumer Litigation Associates, P.C.
1800 Diagonal Road
Suite 600
Alexandria, Virginia 22314
Telephone: 703-273-6080
Facsimile: 888-892-3512
matt@clalegal.com
Counsel for Plaintiff

Richard J. Rubin, Esq.
1300 Canyon Road
Santa Fe, New Mexico 87501
Telephone: 505-983-4418
Facsimile: 505-983-2050
dickrubin@cs.com
Counsel for Plaintiff

/s/

Douglas P. Rucker, Jr. (VSB # 12776)
Andrew Biondi (VSB # 48100)
Cullen D. Seltzer (VSB # 35923)
SANDS ANDERSON PC
2300 Bank of America Center
1111 East Main Street (23219)
P. O. Box 1998
Richmond, VA 23218-1998
(804) 648-1636
(804) 783-7291 (facsimile)
Email: drucker@sandsanderson.com
Email: abiondi@sandsanderson.com
Email: cseitzer@sandsanderson.com
Counsel for Defendants